

**THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

SAMANTHA WATTS, et al.,)
)
Plaintiffs,) Civil Action No. 2:23-cv-00959-
)
) MHW-EPD
v.)
) The Honorable Michael H. Watson
ST. JOHN CENTRAL ACADEMY,) Mag. Judge Elizabeth A. Preston
INC.)
) Deavers
)
Defendant.)

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO RESPOND TO
DEFENDANTS' MOTION TO DISMISS PURSUANT TO FRCP 12(b)(6)**

NOW COMES Plaintiffs, by and through their attorney, with this Motion for Extension of Time to Respond to Defendants' Motion to Dismiss Pursuant to FRCP 12 (b) (6) and hereby states the following:

1. Defendants filed their Motion to Dismiss on June 20, 2023 (ECF 8).
2. Plaintiffs' Response to Defendants' Motion to Dismiss is currently due on July 11, 2023.
3. Plaintiffs' attorney is legally blind. While accommodations are in place, it takes Mr. Altman considerably longer to read, write and prepare documents.
4. Plaintiffs respectfully request an additional 30-day extension of time to file their Response to Defendants' Motion to Dismiss, making the Response due on or before August 8, 2023.

5. Plaintiffs attempted to confer with the Defendants on the present Motion. Plaintiffs were notified by an “out of office assistant” message that Defendants’ counsel is out of the office until next week and were unable to respond to our request.

6. This request is not filed for the purpose of delay, and no party will be prejudiced by the granting of this motion.

7. Due to the nature of this motion, Plaintiffs request that the necessity for a separate memorandum of authorities be waived.

WHEREFORE, the Plaintiffs, by and through their undersigned counsel, respectfully request that the Court grant this Motion for Extension of Time.

Dated: July 6, 2023

Respectfully Submitted,

/s/ Keith Altman

Keith Altman, Esq. (*pro hac vice*)
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on July 6, 2023, a true and accurate copy of the foregoing was filed with the Court's electronic filing system. Notice of this filing will be sent by operation of the Court's CM/ECF system to counsel for all parties in this action indicated on the electronic filing receipt.

Dated: July 6, 2023

/s/ Keith Altman
Keith Altman, Esq. (*pro hac vice*)
Counsel for Plaintiffs